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Attorneys for Defendants

BUTTE COUNTY PROBATION DEPARTMENT, ROXANNE LARA and CANDICE CARR

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION**

JOHN DOE individually, and RICHARD ROE      **Case No.: 2:20-cv-02248-TLN-DMC**  
on behalf of MINORS A, B, and C;

Plaintiffs,

v.

**NOTICE OF DEFENDANTS BUTTE  
COUNTY PROBATION DEPARTMENT,  
ROXANNE LARA AND CANDICE CARR'S  
REQUEST TO SEAL DOCUMENTS**

BUTTE COUNTY PROBATION  
DEPARTMENT, ROXANNE LARA, DAWN  
HOROWITZ-PERSON, CANDICE CARR;

Defendants.

Complaint Filed: 11/09/20

First Amended Complaint Filed: 03/23/22

Second Amended Complaint Filed: 04/15/22

/ Third Amended Complaint Filed: 05/06/22

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Defendants BUTTE COUNTY PROBATION DEPARTMENT, ROXANNE LARA and CANDICE CARR ("Defendants") will and hereby do seek an Order to Seal Documents, pursuant to Local Rules 140 and 141. The documents Defendants request to be sealed are: (1) the Request for Judicial Notice in Support

1 of Defendants' Motion to Dismiss Plaintiffs' Third Amended Complaint ("RJN"); and (2) Exhibit A attached  
2 thereto.

3 Defendants request that the documents be sealed because the public interest in disclosure is extremely  
4 limited and good cause and/or compelling reasons support sealing the records. Specifically, public disclosure  
5 of the records threatens Plaintiffs' privacy interests because the records contain Plaintiffs' identifying  
6 information, which the Court deemed confidential in its January 6, 2021 order granting Plaintiffs' Motion to  
7 Proceed Under Pseudonym. (*See* ECF No. 28, 6:2-5.) Further, Defendants are concerned that Plaintiffs' true  
8 identities may not be protected through redaction alone, and file this Request to Seal out of an abundance of  
9 caution. (*See Id.*)

10 The Request is based on this Notice, the Request to Seal Documents, the pleadings on file in this  
11 action, and any and all evidence that the Court may consider.

12 Pursuant to Local Rule 141(b), the Request to Seal Documents, the Proposed Order, and the  
13 documents covered by the Request were e-mailed to the Honorable District Judge Nunley's proposed orders  
14 email inbox and served on all parties to the case.

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16  
17 Date: June 9, 2022

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20 By /s/ David R. Norton  
David R. Norton  
Alison J. Southard  
Attorneys for Defendants BUTTE COUNTY  
21 PROBATION DEPARTMENT, ROXANNE  
22 LARA and CANDICE CARR  
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